

1 DAYLE ELIESON
United States Attorney
2 DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
3 Social Security Administration
MICHAEL K. MARRIOTT, CSBN 280890
4 Special Assistant United States Attorney
160 Spear Street, Suite 800
5 San Francisco, California 94105
Telephone: (415) 977-8985
6 Facsimile: (415) 744-0134
7 E-Mail: Michael.Marriott@ssa.gov

8 Attorneys for Defendant

9
10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**
12 **LAS VEGAS DIVISION**

| | | | |
|----|----------------------------------|---|---------------------------------------|
| 13 | APRIL BEYRENT, |) | Case No: 2:17-cv-02446-JAD-CWH |
| 14 | |) | |
| | Plaintiff |) | |
| 15 | |) | STIPULATION FOR EXTENSION OF |
| | v. |) | TIME TO FILE DEFENDANT'S CROSS |
| 16 | |) | MOTION TO AFFIRM |
| | NANCY A. BERRYHILL, Acting |) | |
| 17 | Commissioner of Social Security, |) | (First Request) |
| | |) | |
| 18 | Defendant. |) | |
| 19 | |) | |

20 Defendant Nancy A. Berryhill, Acting Commissioner of Social Security, hereby requests
21 an extension of time of thirty days from May 3, 2018 to June 4, 2018, to prepare and file her
22 cross motion to affirm. This is the Commissioner's first request for an extension.

23 Defendant respectfully requests this extension of time because a very heavy workload, as
24 well as an upcoming extended vacation to Taiwan from May 2 through May 19, 2018.

1 On May 1, 2018, Plaintiff's counsel informed Defendant by email that he had no
2 objection to this extension.

3
4 Respectfully submitted,

5 Date: May 1, 2018

LAW OFFICES OF LAWRENCE D. ROHLFING

6 By: /s/* Cyrus Safa

7 CYRUS SAFA

8 *authorized by email May 1, 2018

9 Attorneys for Plaintiff

10 Date: May 1, 2018

DAYLE ELIESON

11 United States Attorney

12 By: /s/ Michael K. Marriott

13 MICHAEL K. MARRIOTT

Assistant Regional Counsel

14 Attorneys for Defendant

15 Of Counsel

16 Jeffrey Chen

Assistant Regional Counsel

17 Social Security Administration

18
19
20 IT IS SO ORDERED.

21
22 DATE: May 2, 2018

23 
HONORABLE CARL W. HOFFMAN

24 United States Magistrate Judge

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

CERTIFICATE OF SERVICE

I, Michael K. Marriott, hereby certify that I caused a copy of Stipulation for Extension of Time to File Defendant's Cross Motion to Affirm to be served, via CM/ECF notification, on:

Cyrus Safa
Law Offices of Lawrence D. Rohlfing
12631 E. Imperial Highway, Suite C-115
Santa Fe Springs, CA 90670

Leonard H Stone
Shook & Stone Chtd.
710 S. Fourth St.
Las Vegas, NV 89101

Date: May 1, 2018

DAYLE ELIESON
United States Attorney

By: /s/ Michael K. Marriott
MICHAEL K. MARRIOTT
Assistant Regional Counsel

Attorneys for Defendant